

# UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30323

Report Nos.: 50-416/84-49

Licensee: Mississippi Power and Light Company

Jackson, MS 39205

Docket No.: 50-416

License No.: NPF-29

Facility Name: Grand Gulf 1

Inspection Conducted: October 21 - November 19, 1984

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Date Signed

Ross Butcher Carroll for

12/17/84

Austin Hardin

Date Signed

Keith Poertner

Date Signed

Approved by: \ tanal

V. Panciera, Section Chief Division of Reactor Projects Date Signed

#### SUMMARY

Scope: This routine, unannounced inspection entailed 225.5 inspector-hours in the areas of Operational Safety Verification, Maintenance Observation, Surveillance Testing Observation, Reactor Scrams, Power Ascension Test Witnessing, and Review of Part 21 Reports.

Results: Of the seven areas inspected, no apparent violations or deviations were identified in six areas; one apparent violation was found in one area (Failure to station a continuous fire watch as required by Technical Specification 3.7.7, paragraph 5).

#### REPORT DETAILS

# 1. Licensee Employees Contacted

J. E. Cross, General Manager

C. R. Hutchinson, Manager Plant Maintenance

\*M. J. Wright, Acting Manager Plant Operations

\*R. F. Rogers, General Manager Technical Assistant

\*L. F. Daughtery, Compliance Superintendent

J. L. Robertson, Operations Superintendent

\*W. A. Russel, Operations Assistant

J. D. Bailey, Compliance

\*V. Holmberg, Fire Project Coordinator

Other licensee employees contacted included technicians, operators, mechanics, security force members, and office personnel.

\*Attended exit interview

## 2. Exit Interview

The inspection scope and findings were summarized on November 19, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings with the following comments. In reference to violation 84-49-01, the licensee feels that operations took the conservative action on October 15, 1984, by documenting the Technical Specification Action Statement 3.7.7. The MNCR 00773-84 had not been evaluated by Nuclear Plant Engineering (NPE) and the exact location of the raceways in question was not listed on the MNCR. The operators, assuming that all the raceways were located in either the Unit 1 control building or auxiliary building, thought that the Technical Specification was being satisfied since all these areas were already being patrolled for other reasons. The licensee also stated that a new MNCR form was issued on October 15, 1984, allowing the Shift Superintendent to return the MNCR for additional information and required a seven day turnaround for the evaluation. This form was not used to document the raceways in question. The licensee stated that the operators took the appropriate action given the information presented to them.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items were not identified during this inspection.

# Operational Safety Verification (71707)

The inspectors kept themselves informed on a daily basis of the overall plant status and any significant safety matters related to plant operations. Daily discussions were held with plant management and various members of the plant operating staff. The inspectors made frequent visits to the control room such that it was visited at least daily when an inspector was on site. Observations included instrument readings, setpoints and recordings; status of operating systems; tags and clearances on equipment controls and switches; annunciator alarms; adherence to procedures; adherence to limiting conditions for operation; temporary alterations in effect; daily journals and data sheet entries; control room manning; and access controls. This inspection activity included numerous informal discussions with operators and their supervisors.

Weekly, when onsite, a selected ESF system is confirmed operable. The confirmation is made by verifying the following: accessible valve flow path alignment; power supply breaker and fuse status; major component leakage, lubrication, cooling and general condition; and instrumentation.

General plant tours were conducted on at least a biweekly basis. Portions of the control building, turbine building, auxiliary building and outside areas were visited. Observations included safety related tagout verifications; shift turnover; sampling program; housekeeping and general plant conditions; fire protection equipment; control of activities in progress; radiation protection controls; physical security; problem identification systems; and containment isolation.

The following comments were noted:

On October 26, 1984, the inspector discovered two more examples of a. previous violation 84-42-02 (failure to document entering an action statement as required by Operations Procedure 02-S-01-17). The first happened or October 25, 1984, when the RO's log stated that one division of the RWCU, RCIC and RHR leakage detection system temperature instrumentation was placed in bypass, which required entering Action Statement 3.3.2. A review of the LCO log revealed that this Action Statement had not been documented as required by Operations Procedure 02-S-01-17. The second example occurred on October 26, 1984, when operations placed the NSSS thermal overload protection bypass switches in test, unbypassing the thermal overload protection for certain reactor coolant system valves. This action required entering Technical Specification Action Statement 3.8.4.2 but was not documented as required by Operation Procedure 02-S-01-17. Since the licensee has not had time to implement an effective program to prevent recurrence of this problem and the actions required by the Technical Specification were being performed, these example all not be listed as a separate violation.

b. On October 15, 1984, the Nuclear Plant Engineering (NPE) Department, per a report from Bechtel, documented several electrical raceways which were not in compliance with the requirements of 10 CFR Part 50 Appendix R. These raceways were documented in Material Nonconformance Report (MNCR) 00773-84. Also on October 15, 1984, Operations documented entering Technical Specification Action Statement 3.7.7 in LCO Report Number 84-0577 requiring fire watches for the areas in which the raceways were located. NPE verified Bechtel's findings per the General Manager's request, and on November 2, 1984, a one hour report per 10 CFR Part 50.72 was made stating the Appendix R discrepancy and the actions taken.

On November 6, 1984, while reviewing the Shift Superintendent's log, the inspector noticed a note attached to a copy of the hourly fire watch log. The note written by the Shift Superintendent, indicated that the location of the electrical raceways listed in MNCR 00773-84 was not known. The inspector entered the control room and questioned the Shift Superintendent on how the Technical Specification Action Statement 3.7.7 for the electrical raceways was being satisfied. The Shift Superintendent informed the inspector that since all fire doors in the control and auxiliary building required an hourly fire watch, then all areas in which the raceways could be located were being patrolled. He also stated that he was requesting the exact location of these raceways from the Operation Superintendent. During the morning of November 7, 1984, the inspectors requested from the fire protection coordinator, the last several days of the fire watch log and the exact location of the electrical raceways listed as not being in compliance with 10 CFR Part 50 Appendix R. Later that morning, after obtaining the location of the raceways from NPE, the fire protection coordinator informed the inspectors that one of the rooms (OC214) in which the raceways were located was in the Unit 2 portion of the control building. The inspectors were also informed that being located in Unit 2, the detectors in that room were not considered operable and fire watches had not been established in that room (OC214) as required by Technical Specifications. The licensee immediately stationed a continuous fire watch in room OC214. The failure of NPE to give operations the location of the electrical raceways and operation to request this information in a timely manner resulted in a violation of Technical Specification 3.7.7. The failure to perform the required fire watches as required by Technical Specification 3.7.7 will be identified as apparent Violation 416/84-49-01, failure to station a continuous fire watch as required by Technical Specification 3.7.7.

#### 6. Maintenance Observation (62703)

During the report period, the inspectors observed the below listed maintenance activities. The observations included a review of the work documents for adequacy, adherence to procedure, proper tagouts, adherence to Technical Specifications, radiological controls, observation of all or part of the actual work and/or retesting in progress, specified retest requirements, and adherence to the appropriate quality controls.

MWO P46057, Temperature Transmitters B21-N602A, N602B, N602C and N602D require calibration

No violations or deviations were identified in the areas inspected.

# 7. Surveillance Testing Observation (61726)

The inspector observed the performance of the below listed surveillances. The observation included a review of the procedure for technical adequacy, conformance to technical specifications, verification of test instrument calibration, observation of all or part of the actual surveillances, removal from service and return to service of the system or components affected, and review of the data for acceptability based upon the acceptance criteria.

06-IC-SD17-V-1028 Liquid Radwaste Effluent Setpoint Adjustment and Source Check

06-IC-1B21-M-1012 Reactor Vessel Pressure (ATWS) Channel A (Trip A) Functional Test

06-IC-1E31-M-1002 Main Steam Line Tunnel, RCIC Equipment Room High Temperature/High Differential Temperature Functional Test

06-EL-SP65-SA-1001 Plant Fire Detectors and Supervisory Panels Functional Tests

No violations or deviations were identified in the areas inspected.

### 8. Reactor Scrams (93702)

The inspectors reviewed activities associated with the below listed reactor scrams. The review included determination of cause, safety significance, performance of personnel and systems, and corrective action. The inspectors examined instrument recordings, computer printouts, operations journal entries, scram reports and had discussions with operations maintenance and engineering support personnel as appropriate.

Scram No. 8, October 14, 1984; the reactor was at 19% power steady state operation with the turbine rolling at 400 RPM. Grid disturbance caused by severe weather conditions south of the plant, caused a loss of instrument air resulting in the isolation of the condensate precoat filters. The isolation of the filters caused a loss of feed to the reactor and a scram occurred due to low water level. RCIC was started manually to recover and maintain reactor water level. NPE is considering numerous recommendations that have been made by the Technical Engineering Group in order to prevent such scrams in the future.

The design change initiated to correct this problem will be reviewed by the inspector for the close out of the LER 84-045 which is associated with this scram.

No violation or deviations were identified in the areas inspected.

# 9. Power Ascension Testing (72528C)

The inspector has monitored and observed the activities associated with startup testing. The inspector kept current on the test schedule and attended startup status and planning meetings. The startup engineer's log was reviewed during the daily control room tour.

The inspector observed all or part of the preparation for conduct, of the below listed startup procedures and operations. The observation included a review of the procedure for meeting all test prerequisites, initial conditions, test equipment and calibration requirements. Where test results were available, in preliminary or final form, they were verified to be consistent with observations or that overall test acceptance criteria had been met.

1-El2-SU-71-1 Residual Heat Removal System Test, Revision 1

1E12-SU-14-2 RCIC System Test, Revision 2

No violations or deviations were identified in the areas inspected.

# 10. Review of Part 21 Reports (92716)

Generic Electric (GE) notified the NRC by a letter dated October 8, 1984, of a reportable condition per 10 CFR 21 regarding the adjustment of the low voltage shutoff and turnon for GE dedicated inverters being improperly set. Grand Gulf was identified as one of the affected facilities.

The licensee stated that they had been contacted by GE regarding the above Part 21 report and are awaiting a Field Disposition Instruction (FDI) to test inverter trip and restart voltages and adjust as necessary. The licensee is tracking this item for followup.

# 11. Notification of Containment Operability

MP&L's letter AECM-84/0518 dated November 19, 1984, addressed the NRC concerns over Unit 1 containment operability which resulted from identified material nonconformances of five closure plates. The Region has reviewed the evaluation/technical justifications presented in this letter, and no longer considers containemnt operability to be in question.